



# MEMORANDUM

**FROM:** Thomasenia P. Duncan  
General Counsel

**Susan L. Lebeaux** *SL*  
**Acting Deputy Associate General Counsel for Enforcement**

**Marianne Abely**  
**Attorney at Law**

**SUBJECT: MUR 5849 (Bank of America)**

Attached is a proposed conciliation agreement that has been signed by counsel for the Respondent, Bank of America Corporation. This proposed conciliation agreement would settle violations of 2 U.S.C. §§ 441b(a) and 441f in connection with the Respondent's making impermissible corporate contributions in the names of others.

[REDACTED]

Therefore, we recommend that the Commission accept the signed conciliation agreement and close the file with respect to the Bank of America Corporation.

**RECOMMENDATIONS:**

1. Accept the signed conciliation agreement with the Bank of America Corporation.
2. Approve the appropriate letters.
3. Close the file with respect to the Bank of America Corporation.

[REDACTED]

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